

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	No. 4:07CR405 HEA
	)	
ROBERT D. HARTMANN,	)	
	)	
Defendant.	)	

**GOVERNMENT'S OPPOSITION TO DEFENDANT'S**  
**MOTION TO CHANGE CONDITION OF BOND**

COMES NOW the United States of America, the plaintiff herein, by Michael W. Reap, Acting United States Attorney for the Eastern District of Missouri, and James E. Crowe, Jr., an Assistant United States Attorney for said District, and, for the reasons set forth below, opposes the defendant's Motion to Change Condition of Bond:

We oppose the motion as filed by the defendant to have a blanket authority to extend the home confinement aspect of his bond to 10:00 p.m. every night. The Pretrial Services Office advises that this request runs counter to their longstanding policy against routine curfews into the late evening. They have also advised us that they would entertain specific requests for extensions for special events.

**WHEREFORE**, the defendant's motion should be denied.

Respectfully submitted,

MICHAEL W. REAP  
Acting United States Attorney

/s/ James E. Crowe Jr.  
JAMES E. CROWE, JR., #6674  
Assistant United States Attorney  
111 South 10th Street, Room 20.333  
St. Louis, Missouri 63102  
(314) 539-2200

**CERTIFICATE OF SERVICE**

I hereby certify that on April 20, 2009, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon the following:

Burton H. Shostak  
Grant Shostak  
Moline, Shostak & Mehan, LLC  
8015 Forsyth Blvd.  
St. Louis, MO 63105

/s/ James E. Crowe, Jr.  
Assistant United States Attorney